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January 14, 2025

By ECF

Because these proposed redactions are consistent with the redactions previously authorized by the Court, ECF No. 21, the motion to seal is GRANTED. The Clerk of Court is directed to terminate ECF No. 33.

Hon. Jesse M. Furman
United States District Court for the
Southern District of New York
40 Foley Square
New York, New York 10007

SO ORDERED.

A handwritten signature in black ink, appearing to read 'John J. Clarke, Jr.'

January 15, 2025

Re: UMB Bank, N.A. v. Bristol-Myers Squibb Company, et al., No. 24 Civ. 8668 (JMF)

Dear Judge Furman:

We represent defendant Bristol-Myers Squibb Company (“BMS”) in this action. In accordance with the Court’s Individual Rules and Practices in Civil Cases, I am writing to respectfully request leave of the Court to file under seal the memorandum of law in support of BMS’s motion to dismiss this action for lack of subject matter jurisdiction and for failure to state a claim that is being filed today.

Sealing of the unredacted brief is warranted to protect personal confidential information of beneficial owners of the CVRs that is discussed in the memorandum of law. The confidential information was obtained from exhibits to the complaint that were filed under seal by plaintiff UMB Bank N.A. (“UMB”) pursuant to an Order entered on November 22, 2024 [ECF No. 21].

BMS is filing on the public docket a redacted version of the memorandum of law in support of the motion to dismiss. The limited redactions shield from public view any discussion of the confidential information referred to above. We are submitting to the Court under seal, and serving on counsel for the other parties, an unredacted copy of the memorandum of law in which the redactions have been highlighted.

Respectfully submitted,

Of Counsel:

Jessica A. Masella

/s/ John J. Clarke, Jr.

John J. Clarke, Jr.